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6  
7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 PERIENNE DE JARAY,

11 Plaintiff,

12 v.

13 ATTORNEY GENERAL OF CANADA  
14 FOR HER MAJESTY THE QUEEN,  
CANADIAN BORDER SERVICES  
15 AGENCY, GLOBAL AFFAIRS CANADA  
fka DEPARTMENT OF FOREIGN  
16 AFFAIRS AND INTERNATIONAL  
TRADE CANADA, GEORGE WEBB,  
17 KEVIN VARGA, and PATRICK LISKA,

18 Defendants.

No.: 2:16-cv-00571

DECLARATION OF ANDREW C.  
LAUERSDORF IN SUPPORT OF  
PLAINTIFF'S MOTION FOR LEAVE TO  
SEEK DISCOVERY

19 I, Andrew C. Lauersdorf, declare as follows:

20 1. I am an attorney with the law firm of Maloney Lauersdorf Reiner,  
21 PC, counsel to Plaintiff Perienne de Jaray in this matter. I have personal  
22 knowledge of the following facts gained in my capacity as counsel.

23 2. Attached as Exhibit 1 is a true and correct copy of an email from  
24 Assistant United States Attorney Todd Greenberg to Mark Bartlett in Seattle.  
25 My office received a copy of the email from Mr. Bartlett, who was counsel to  
26 Perienne de Jaray.

1           3.     Attached as Exhibit 2 is a true and correct copy of Plaintiff's  
2 proposed First Set of Interrogatories and Requests for Production to All  
3 Defendants.

4           4.     Attached as Exhibit 3 is a true and correct copy of Plaintiff's  
5 proposed Notice of Deposition of Defendant Kevin Varga, whom Plaintiff  
6 understands was one of the individuals who contacted and met with witnesses  
7 in Washington State and elsewhere in the United States.

8           5.     Attached as Exhibit 4 is a true and correct copy of Plaintiff's  
9 proposed subpoena to the Federal Bureau of Investigation.

10          6.     Attached as Exhibit 5 is a true and correct copy of Plaintiff's  
11 proposed subpoena to the United States Attorney's Office.

12           I declare under penalty of perjury under the laws of the United States  
13 that the foregoing is true and correct to the best of my knowledge, information,  
14 and belief.

15           DATED this 13th day of October, 2016.

17                               /s/Andrew C. Lauersdorf  
18                               Andrew C. Lauersdorf, WSBA #35418